

April 15, 2016

VIA EMAIL AND FEDERAL EXPRESS

Ms. Nicoletta M. DiForte
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
Region II
290 Broadway, 19th Floor
New York, NY 10007-1866

Amy Chester, Esq.
Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency
Region II
290 Broadway, 16th Floor
New York, NY 10007-1866

Re: Request for Information Pursuant to 42 USC § 9604(e)
Regarding Hoosick Falls - Perfluorooctanoic Acid ("PFOA")

Dear Ms. DiForte and Ms. Chester:

We write on behalf of our client, Honeywell International Inc. ("Honeywell") in response to your February 18, 2016 letter ("Request"). As we understand your Request it seeks both general and specific information relating to any past or present operations and the release, or threat of release, of hazardous substances, pollutants or contaminants, including without limitation PFOA, at or from facilities or operations located in, or within a fifteen mile radius of, Hoosick Falls, New York.

General Response to EPA's Letter

EPA's Request includes four separately-numbered information questions. Request 1 includes seventeen overlapping subparts. Honeywell has the following general objections to EPA's Request:

A. Honeywell generally objects to the Request to the extent that it seeks information or documents protected from discovery by the attorney-client privilege, the attorney work product doctrine, the self-evaluative privilege, or any other applicable privilege or doctrine. Nothing contained in these objections or the responses below is intended as, or shall in anyway be deemed, a waiver of privilege. Honeywell further objects to the Request to the extent that it seeks confidential or proprietary business information or settlement confidential information.

B. Honeywell generally objects to the Request to the extent that it seeks information and/or documents not in the possession, custody, or control of Honeywell.

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C. Honeywell generally objects to the Request to the extent that it seeks information which may be derived or ascertained from documents already within the knowledge, possession or control of EPA.

D. Honeywell generally objects to the Request to the extent that it is overbroad or unduly burdensome.

E. Honeywell generally objects to the Request to the extent it seeks information in excess of the limited authority granted EPA in Section 104(e) of CERCLA.

F. Honeywell generally objects to the Request on the grounds that the issuing official has not provided evidence of the delegations on which that official purports to issue the Request.

G. Honeywell is responding to the Request, as further set forth below, without waiving any of the foregoing objections, or any other valid objections and without admitting to any factual or legal basis for any liability. Honeywell responds to the Request in the interests of cooperating with the EPA in potential response activities related to the release, or threat of release, of hazardous substances, pollutants or contaminants, including without limitation PFOA, at or from facilities or operations located in, or in the vicinity of, the Village of Hoosick Falls, and the Town of Hoosick, New York.

H. As further explained in Response 2 below, Honeywell has not had an interest in any operations in the vicinity of the Village of Hoosick Falls or the Town of Hoosick, New York since 2000. Moreover, in 1996 Honeywell sold several of the facilities identified in the Request. As a result, the information available to Honeywell is limited. Nevertheless, Honeywell is presently negotiating one or more Orders on Consent and Administrative Settlements with the New York State Department of Environmental Conservation ("NYDEC") which, when executed and delivered, are expected to govern the investigation of John Street/3 Lyman Street, (DEC Site No.: 442049), River Road Plants 1, 2, and 3 (DEC Site No.: 442008), 14 McCaffrey Site (DEC Site No. 442046) and 1 Liberty Street DEC Site No. 442048) as well as surrounding areas (the "Orders"). Accordingly, this response reflects a diligent search of Honeywell's records, in locations where it has been reasonably determined that such records, to the extent they existed, were likely to be located. Honeywell reserves the right to supplement this response (but does not assume the obligation to do so) in the event that it locates additional responsive non-privileged documents or information, or to the extent that any Remedial Investigation/Feasibility Study undertaken at any of these facilities generates relevant information.

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Requests for Information

1. Please provide the following information for: i) the facility located at or about 14 McCaffrey Street in Hoosick Falls, New York; ii) the facility located at or about 1 Liberty Street in Hoosick Falls, New York; iii) the facility located or formerly located at or about 1 Mechanic Street in Hoosick Falls, New York; iv) the facility located or formerly located at or about 80 First Street in Hoosick Falls, New York; v) the facility located or formerly located at or about 3 Lyman Street in Hoosick Falls, New York; vi) the facility located or formerly located at or about 21410-12 Rte 22 in Hoosick Falls, New York; and vii) any other facility that is or has been owned or operated by the Company in or within a fifteen mile radius of Hoosick Falls, New York.

Request 1a. Identify each facility in which a PFC, PFC-containing or PFC-producing material is or was stored, used, processed, manufactured, managed, released, generated as a by-product, derivative or thermal breakdown product, or otherwise present (hereinafter collectively referred to as "handled"). Identify each specific PFC (for example, PFOA), PFC-containing or PFC-producing material that is or was handled at each such facility, and state the time period during which each PFC, PFC-containing or PFC-producing material was or has been handled at each such facility.

Response 1a:

Honeywell understands that PFC-containing materials - ranging from plumbing supplies, gaskets and tape to finished or semi-finished coatings to commercial and consumer packaging - are or were used in numerous products. As a result, PFCs are, or were, "otherwise present" at many and perhaps all businesses and residences in the United States. Because of the presence of PFOA in and around the Village of Hoosick Falls, Honeywell interprets this request to be directed at raw PTFE materials (polytetrafluorethylene resin, also known as Teflon®) that were converted or otherwise applied as surface coatings using liquid dispersions (resulting in the potential for spills or permitted/unpermitted discharges) and then dried or sintered (with the potential for air emissions). Thus, although Honeywell has: (i) information which indicates that at 21410-12 Rte 22 (a/k/a River Road Plants 2 and 3) finished PTFE products may have been trimmed, cut and etched (and has seen unconfirmed newspaper accounts which suggest that PTFE was possibly extruded at this location), and (ii) learned of unconfirmed reports that solid or 'cured' Teflon® sheets may have been cut or trimmed and used to line or fabricate custom electroplating tanks at 80 First Street, based upon the information presently available, and pending the results of any Remedial Investigation/Feasibility Study undertaken at any of these facilities under the NYDEC Orders, Honeywell does not reasonably expect that operations at River Road Plants 2 and 3 or 80 First Street would have generated any PTFE, PTFE by-product,

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derivative or thermal breakdown product that were released into the environment. On this basis, Honeywell has identified the use of raw PTFE compounds being applied as part of operations that involved drying or sintering only at the following locations:

- 14 McCaffrey Street: This facility appears to have engaged in operations understood to have used PFCs from approximately 1961 until at least 1996 when it was sold to Furon Company. Operations at this location included surface coating, extrusion and other processes using PTFE as a raw material.
- 1 Liberty Street: This facility appears to have engaged in operations understood to have used PFCs from approximately 1972 until at least 1996 when it was sold to Furon Company. Operations at this location included surface coating, extrusion and other processes using PTFE as a raw material.
- 3 Lyman Street: This facility appears to have engaged in operations understood to have used PFCs beginning in the mid-1950s until approximately 1996 when production was phased-out. Operations at this location included surface coating, extrusion and other processes using PTFE as a raw material.

Honeywell has not located or otherwise identified detailed information indicating how each PFC, PFC-containing or PFC-producing material was handled at each facility.

Request 1b. For each facility identified in response to Question 1.a., provide details indicating how each PFC, PFC-containing or PFC-producing material is or was handled, the quantity of each specific PFC, PFC-containing or PFC-producing material handled on an annual basis, and the date such operations commenced and concluded.

Response 1b:

Honeywell has not located or otherwise identified detailed information indicating how each PFC, PFC-containing or PFC-producing material is or was handled, or the quantity of each specific PFC, PFC-containing or PFC-producing material handled on an annual basis at any of the specified facilities. Honeywell has identified limited information regarding the types of products produced based upon a document entitled Health, Safety and Environmental Disclosure Schedule prepared in 1995 in connection with the sale of assets to Furon which is attached as Exhibit A.

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Request 1c. For each facility identified in response to Question 1.a., state the correct legal name(s) of each current and past owner and operator of the facility and the street and present mailing address of each such owner and operator. For each such entity, explain its direct or indirect relationship to your Company (if any), the time period when the entity owned or operated the facility, and the nature of the operations conducted by the entity at the facility.

Response 1c:

- 14 McCaffrey Street: This facility is believed to be presently owned by Saint-Gobain Performance Plastics Corporation ("Saint-Gobain") as the successor by merger to Furon Company ("Furon"). This property is believed to be active. Honeywell acquired its interest in this facility in 1986 and sold this facility in 1996.
- 1 Liberty Street: This facility is believed to be presently owned by Saint-Gobain as the successor by merger to Furon. This property is believed to be active. Honeywell acquired its interest in this facility in 1986 and sold this facility in 1996.
- 3 Lyman Street: This facility is presently owned by AlliedSignal Laminates Systems, Inc. This property is vacant. Honeywell acquired its interest in this facility in 1986 and operations at this facility involving handling of PFC ceased in the mid-1990s. Removal of the buildings was completed in 2012.

Request 1d. For each facility identified in response to Question 1.a., describe in detail the manufacturing process(es) which utilized a PFC, PFC-containing or PFC-producing material either as a component employed in the formulation of an object made for sale, for use offsite or onsite, as a reagent in the manufacturing process, or as an item utilized in maintenance activities. Indicate the specific PFC, PFC-containing and/or PFC-producing material involved, and the time frames such manufacturing processes commenced and concluded at each facility.

Response 1d:

Honeywell does not presently have a detailed understanding of the manufacturing process(es) which may have utilized a PFC, PFC-containing or PFC-producing material either as

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a component employed in the formulation of an object made for sale, for use offsite or onsite, as a reagent in the manufacturing process.

Honeywell's general understanding is that the facilities at 14 McCaffrey Street, 1 Liberty Street and 3 Lyman Street were used to manufacture pressure sensitive tape, coated fiberglass cloth and yarn and Teflon® tape. The Health, Safety and Environmental Disclosure Schedule prepared in 1995 by AlliedSignal Laminate Systems Inc. in connection with the sale of assets to Furon contains the most complete description of these operations and is attached as Exhibit A. Products manufactured at these locations are believed to have used PTFE.

Request 1e. For facility identified in response to Question 1.a., identify any type of process equipment and/or machinery employed, the location of the process equipment and/or machinery, how the process equipment and/or machinery and related apparatus are and were cleaned, and how residue or rinsate from the process equipment and/or machinery is and was managed, treated and/or disposed of. If rinsate or residue was collected in drums, tanks, dip tanks, vats, baths, settling pits or other units, please provide details regarding these units, including their location, periods of use, whether there were releases from these units, and how such releases were managed and/or remediated. Provide detailed maps or diagrams on which each of the locations referred to in your answer to this question is clearly marked.

Response 1e:

See Exhibit A. See also maps or diagrams in documents attached as Exhibit B.

Request 1f. Of the facilities identified in response to Question 1.a., indicate which facilities operated and maintained heating or fabric coating towers for the application of PFOA/APFO, epoxy resins or any other type of dispersion agents or materials. Identify all of the specific materials (including polymers, dispersion agents and surfactants) used in these operations including: their annual volumes; how the PFOA/APFO is and was applied; how the towers and dip tanks are and were maintained and cleaned; the operational temperatures and exit velocities from the oven exhaust; the specific materials discharged from the oven exhausts; the height of the towers, including the stack, if any, projecting outside of the building; and how these processes changed through the years of operation at each specific facility. Provide detailed maps or diagrams on which the towers referred to in your answer to this question are clearly marked.

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Response 1f:

Based upon the limited information presently available to it, Honeywell believes that heating or fabric coating towers for the application of Teflon®, epoxy resins or any other type of dispersion agents or materials may have been used at 14 McCaffrey Street and 1 Liberty Street. Honeywell has no information about the specific materials used or the construction or operation of the towers. See also Responses 1a; 1b; 1c and 1d.

Request 1g. Provide copies of all available process diagrams and/or design schematics specifically for each of the facilities identified in response to Question 1.a. and the processes identified in response to Questions 1.d., e. and f.

Response 1g:

See Health, Safety and Environmental Disclosure Schedule attached as Exhibit A and documents attached as Exhibit B.

Request 1h. For each facility identified in response to Question 1.a., indicate whether any hazardous substances, pollutants or contaminants, including PFC, PFC-containing or PFC-producing materials, are or have been discharged directly into a sewer, septic system, or any type of subsurface structures, including injection wells. If so, indicate which specific production wastes, process chemicals or raw materials, and the time period during which this occurred, and provide a diagram indicating the location of the sewer(s), septic system(s) or any type of subsurface structures, including injection wells. Also provide the results of any sewer integrity investigations.

Response 1h:

Honeywell has not located any documents or other information regarding whether PFCs, PFC-containing or PFC-producing materials, are or have been discharged directly into a sewer, septic system, or any type of subsurface structures, including injection wells.

With regard to hazardous substances, pollutants or contaminants that are not PFCs, Honeywell has located certain Environmental Site Assessment reports which suggest that the facilities identified in response to Question 1.a utilized public sewers for some period of time. In

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addition, septic systems, or other types of subsurface structures that may have received wastewater or non-contact cooling water (or both) were present prior to the 1990s at 3 Lyman Street.

See Health, Safety and Environmental Disclosure Schedule attached as Exhibit A. See also Environmental Site Assessment Reports attached as Exhibit B and Report Summarizing Findings of Review of Pollution Control Programs attached as Exhibit D.

Request 1i. For each facility identified in response to Question 1.a., indicate whether any hazardous substances, pollutants or contaminants, including PFC, PFC-containing or PFC-producing materials, are or have been discharged into surface waters through outfalls that were permitted by a state or federal National Pollution Discharge Elimination System (NPDES) permit (or that were not permitted). Explain the process leading to these discharges, the location of each point of discharge (permitted or not), the specific production wastes, including PFC, PFC-containing and/or PFC-producing materials, that were involved, and the time frames during which these discharges occurred. Provide copies of all such permits. Also, provide detailed maps or diagrams on which each of the discharge points is clearly marked.

Response 1i:

Honeywell has not located documents or otherwise identified information which indicates that any hazardous substances, pollutants or contaminants or PFCs, PFC-containing or PFC-producing materials, are or have been discharged into surface waters through outfalls that were permitted by a state or federal NPDES permit (or that were not permitted).

See NPDES permits attached as Exhibit C.

Request 1j. For each facility identified in response to Question 1.a., indicate whether any hazardous substances, pollutants or contaminants, including PFC, PFC-containing or PFC-producing materials, is or was stored in an underground or above-ground storage tank. If yes, provide the following answers and all documents relevant to your responses:

i. Supply the date when the tanks were installed, each tank's size and material of construction, where they were installed, for what purpose, and which specific production wastes,

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process chemicals or raw materials, including PFC, PFC-containing or PFC-producing materials, are or were stored in them.

ii. Were any of these tanks ever removed or did they ever leak? If so, provide details on any investigation or remediation associated with these tanks, including the time frames when these occurred.

iii. Provide maps or diagrams on which the tank locations are clearly marked.

Response 1j:

Honeywell has not located documents or otherwise identified information which indicates that PFCs, PFC-containing or PFC-producing materials, are or were stored in any underground or above-ground storage tanks.

With regard to hazardous substances that are not PFCs, the responsive information that Honeywell has identified to date is as follows:

- 14 McCaffrey Street: This facility had a 10,000 gallon underground storage tank used for #2 fuel oil. Although the installation date is unknown, the fuel oil tank was removed in 1995. This facility also had an 18,000 gallon above-ground LP gas tank in 1996 when the facility was transferred to Furon.
- 1 Liberty Street: This facility had a 8,000 gallon underground storage tank used for #2 fuel oil. Although the installation date is unknown, the fuel oil tank was closed in place in 1995. This facility also had an 18,000 gallon above-ground LP gas tank in 1996 when the facility was transferred to Furon.
- 3 Lyman Street: This facility (a/k/a John Street) had a 10,000 gallon underground storage tank used for #2 fuel oil. The tank was installed in 1970 and removed in 1995. This facility also had an 7,500 gallon above-ground LP gas tank in 1996 which was removed by 2012

Request 1k. For each facility identified in response to Question 1.a., describe all leaks, spills, disposal or other releases of any hazardous substance, pollutant or contaminant, including but not limited to a PFC, PFC-containing or PFC-producing materials, that occurred at or from the facility. The response should include but not be limited to the following information as to each such occurrence:

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- i. The date of the occurrence;
- ii. The specific location of the occurrence (indicate on a map);
- iii. The quantity of material leaked, spilled or released;
- iv. Steps taken to remediate or stop the release;
- v. The specific hazardous substance, pollutant or contaminant that was involved, including the nature and composition of the material, and the physical state (solid, liquid, etc.) of such material; and
- vi. A copy of all documentation relating to the release.

Response 1k:

Honeywell has not located documents or otherwise identified information concerning leaks, spills, disposal or other releases of PFCs, PFC-containing or PFC-producing materials.

With regard to hazardous substances, pollutants or contaminant that are not PFCs, the primary responsive information that Honeywell has identified to date is as follows:

- 14 McCaffrey Street: This facility underwent a Spill Investigation (Site # 9909741) under oversight of the New York Department of Environmental Conservation ("DEC"). A No-Further Action letter was issued on September 28, 2012. See Exhibit E.
- 1 Liberty Street: This facility underwent a Spill Investigation (Site # 9909741) under oversight of the New York Department of Environmental Conservation ("DEC"). A No-Further Action letter was issued on September 28, 2012. See Exhibit E.
- 3 Lyman Street: Based upon the description in the October 4, 1988 Report Summarizing Finding of Review of Pollution Control Programs attached as Exhibit D, it appears that prior to 1988, some process waste-water was discharged onto soils.

Request 1l. For each facility identified in response to Question 1.a., indicate whether a PFC, PFC-containing or PFC-producing material is being, has been or may have been released from

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air emitting sources, including stacks, fans, vents or any other point of emission. If so, identify each source and the specific PFC, PFC-containing or PFC-producing material involved, and provide any related air permits. Explain the process leading to the emission of the PFC, PFC-containing or PFC-producing material, and the time frames during which these air emissions may have occurred. Provide any air monitoring reports and analytical data related to these air emissions. Also, provide detailed maps or diagrams on which each of the air emitting sources referred to in your answer to this question is clearly marked.

Response 1l:

Honeywell has not located documents or otherwise identified information which confirms that PFCs, PFC-containing or PFC-producing material are being, or have been released from air emitting sources, including stacks, fans, vents or any other point of emission. However, the operations at each facility identified in response to Question 1.a involved heating of products that contained PTFE and Exhibit B describes the processes and points of emission at these facilities. See also Response 1m and Exhibit F.

Request 1m. Provide copies of air models developed with respect to any of the facilities identified in response to Question 1.a., including dispersion, photochemical or receptor models.

Response 1m:

See Exhibit F.

Request 1n. Please provide a list identifying all off-site treatment, storage or disposal sites used by each facility identified in response to Question 1.a. for any PFC, PFC-containing or PFC-producing material. The list should include all locations used both within and outside of Hoosick Falls, regardless of whether the site or property was permitted or not permitted. The list should include the following information:

- i. The name and address of each such disposal or treatment site;
- ii. The time period the material was disposed and/or treated;
- iii. How the material was treated and/or disposed;

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- iv. The specific PFC, PFC-containing or PFC-producing material involved;
- v. The quantity, nature and composition of the material, and its physical state (solid, or liquid, etc.); and
- vi. Any shipping documents, manifests or bills of lading prepared with respect to the off-site shipment of the materials.

Response 1n:

Honeywell has not located documents or otherwise identified information concerning off-site treatment, storage or disposal sites used by any facility identified in response to Question 1.a. to manage or dispose of any PFCs, PFC-containing or PFC-producing material.

Request 1o. Provide a map which shows all monitoring wells installed at or near each of the facilities identified in response to Question 1.a. In addition, please provide the identification system used to identify each well, the total depth and size of each well, and the depth and the length of each well screen. In addition, provide all boring logs for each monitoring well location.

Response 1o:

See Exhibit B.

Request 1p. For each facility identified in response to Question 1.a., identify any water supply/production wells that were operated and maintained onsite at any of the facilities. Provide the date for when the wells were installed, the depth and size of each well, the length of each well screen, construction and well logs, pumping rates, daily/annual usage and the results of any pump tests that may have been performed. Include a map identifying the location of the well(s).

Response 1p:

Honeywell has not located documents or otherwise identified information which indicates that any of the facilities identified in response to Question 1.a. operated or maintained any water supply/production wells.

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Request 1q. Please submit all reports and analytical data from the sampling of soils, sediments, groundwater, surface water, or marine life at or near any of the facilities identified in response to Question 1.a., along with maps showing the respective sampling locations.

Response 1q:

See Exhibits B; E and G.

Request 2. What is the direct or indirect corporate or legal relationship between each of the entities listed in the definition of “the Company” in Section B., Definitions, of the Instructions for Responding to Request for Information set forth above? In addition, provide a chronology showing the acquisitions and/or mergers involving these companies.

Response 2:

Based upon documents that Honeywell has located and reviewed to date, it appears that on or about:

- 1932; Oak Industries Inc. was incorporated in Illinois (and in 1969 was reincorporated in the Delaware).
- Mid-1950s and up until 1967: Dodge Industries, Inc. either directly or through one of its wholly owned subsidiaries or corporate predecessors acquired property and or facilities at 14 McCaffrey Street, 1 Liberty Street and 3 Lyman Street.
- October 31, 1966: Dodge Machine & Tool Company, Inc. changed its name to Dodge Machine Company, Inc.
- December 14, 1966: Dodge Fibers Corporation changed its name to Dodge Industries, Inc.
- June 1967: Dodge Industries, Inc. transferred all or substantially all of its real property holdings in Hoosick to Oak Electro/Netics Corp.
- June 24, 1968: D. M. C. Acquisitions Company, Inc. was incorporated.

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- August 15, 1968: D. M. C. Acquisitions Company, Inc. changed its name to Dodge Machine Company, Inc.
- August 15, 1968: Dodge Machine Company, Inc. changed its name to DMC of Hoosick Falls, Inc.
- January 1970: Oak Electro/Netics Corp. acquired assets of Atlantic Laminates, Inc.
- December 1, 1975: Dodge Industries, Inc. changed its name to Oak Materials Group, Inc.
- June 23, 1978: Oak Technology Inc. filed its certificate of incorporation.
- May 2, 1986: AlliedSignal, Inc. acquired the materials segment of Oak Industries Inc.
- December 30, 1986: Oak Technology Inc. changed its name to Norplex/Oak Inc.
- January 13, 1989: Norplex/Oak Inc. changed its name to Norplex Oak Inc.
- December 16, 1992: Norplex Oak Inc. changed its name to AlliedSignal Laminate Systems Inc.
- December 1, 1999: AlliedSignal Inc. (AlliedSignal) and Honeywell Inc. (former Honeywell) completed a merger under an Agreement and Plan of Merger dated as of June 4, 1999. Under the Merger Agreement, a wholly-owned subsidiary of AlliedSignal merged with and into the former Honeywell. As a result of the merger, the former Honeywell has become a wholly-owned subsidiary of AlliedSignal. At the effective time of the merger AlliedSignal was renamed Honeywell International Inc. ("Honeywell").
- July 1999: AlliedSignal, Inc. sold assets to Isola AG.
- September 2000: AlliedSignal Laminate Systems, Inc. sold its shares in Oak-Mitsui, Inc., a New York corporation, and its interest in Oak-Mitsui, a South Carolina general partnership to Mitsui Mining & Smelting Netherlands B.V. ("Mitsui Mining").

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AlliedSignal Laminates Systems, Inc. is an affiliate of Honeywell or its corporate predecessors. Tri-Point Industries and Circuit Materials are understood to have been affiliates of Oak Industries Inc. Honeywell has no information concerning Oak Industries Materials Group, Inc. Honeywell has no direct or indirect corporate relationship with Saint-Gobain; Mitsui Mining; D. M. C. Acquisitions Company, Inc. (formerly Dodge Machine Company, Inc.); or DMC of Hoosick Falls, Inc.

Request 3. Please provide a copy of all agreements in or pursuant to which the Company provided or received indemnification with respect to environmental liability relating to any of the facilities identified in response to Question 1.a.

Response 3:

See November 9, 1995 Asset Purchase Agreement attached as Exhibit H.

Request 4. Please state the name, title and address of each individual who assisted or was consulted in the preparation of your response to this Request for Information. In addition, state whether this person has knowledge of the information in the answers provided.

Response 4:

These responses were prepared by Honeywell staff with the assistance of counsel under the direction and supervision of D. Evan van Hook, Corporate V.P. Health, Safety, Environment, Product Stewardship and Sustainability, Honeywell, 115 Tabor Road, Morris Plains, NJ 07950. None of the individuals who participated in the preparation of these responses have any firsthand knowledge about where PFOA, its constituents or any material containing PFOA was handled in Hoosick.

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We are available to help explain this information to you and your staffs; please contact me to discuss how we can best help with that effort.

Sincerely,


Michael Daneker (sfw)

Attachments

cc: Thomas Berkman, Esq. (NYDEC)(w/enc.)
Christopher Gibson, Esq. (St. Gobain)

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Index of Exhibits to Honeywell's Response to EPA's February 18, 2016 letter¹

Exhibit	Description	Responsive to EPA's Requests Number	Bates Numbers on Attached CD
A	Health, Safety and Environmental Disclosure Schedule to November 9, 1995 Agreement	1b, 1d, 1e	HONEPAHOOSICK-0000001 to HONEPAHOOSICK-0000016
B	August 1995 Draft Phase I Reports prepared for Furon for McCaffrey Street May 1996 Final Phase II Reports prepared for Furon for McCaffrey and Liberty Streets	1e, 1g, 1j, 1k, 1q	HONEPAHOOSICK-0000017 to HONEPAHOOSICK-0000345
C	NPDES permits	1i	HONEPAHOOSICK-0000346 to HONEPAHOOSICK-0000375

¹ Several documents which are being produced by Honeywell have been stamped "Confidential" or "Attorney-Client Privileged." These designations were made by others and appear to reflect customary business practices at the time and in the circumstances that these materials appear to have been initially prepared. However, Honeywell has not had an opportunity to fully reconstruct the source and chain of custody for these materials. Honeywell is not ratifying or endorsing the prior designations or attempting to assert or extend any claims of confidentiality or privilege over these documents.

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D	October 4, 1988 Report Summarizing Findings of Review of Pollution Control Programs	1h	HONEPAHOOSICK-0000376 to HONEPAHOOSICK-0000379
E	August 22, 1991 No Further Action Letter September 28, 2012 No Further Action Letter	1k	HONEPAHOOSICK-0000380 to HONEPAHOOSICK-0000381
F	Air Dispersion Models	1m	HONEPAHOOSICK-0000382 to HONEPAHOOSICK-0000390
G	June 10, 2011 Vapor Intrusion Investigation Report for 1 Liberty Street June 10, 2011 Vapor Intrusion Investigation Report for McCaffrey Street	1q, 1k	HONEPAHOOSICK-0000391 to HONEPAHOOSICK-0000479
H	Asset Purchase Agreement by and among Furon Company as Purchaser, AlliedSignal Laminate Systems, Inc. as Seller and AlliedSignal Inc. as Parent dated as of November 9, 1995	1c, 3	HONEPAHOOSICK-0000480 to HONEPAHOOSICK-0000531